

DOAR RIECK KALEY & MACK

ATTORNEYS AT LAW

JOHN DOAR (1921-2014)
JOHN F. KALEY
WALTER MACK

OF COUNSEL
JOHN JACOB RIECK, JR.
JAMES I. WASSERMAN
DAVID RIVERA
MICHAEL MINNEFOR

ASTOR BUILDING
7TH FLOOR
217 BROADWAY
NEW YORK, N.Y. 10007-2911

TELEPHONE: (212) 619-3730
FACSIMILE: (212) 962-5037
e-mail: firm@doarlaw.com
website: www.doarlaw.com

July 8, 2019

Via ECF and Email

Hon. Paul A. Engelmayer
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Randall, et al.*,
Docket No. 19 Cr. 131 (PAE)

Dear Judge Engelmayer:

I represent Geraldine Faustin in the above referenced matter. I am writing to request a modification of Ms. Faustin's bail conditions to allow a curfew as noted below.

Geraldine Faustin was arrested in this case on February 27, 2019 and released on conditions principally requiring a bond in the amount of \$50,000 cosigned by two financially responsible individuals, with home confinement with electronic monitoring to permit her to work, Pretrial Services supervision and with travel restricted to the SDNY and EDNY. All conditions have been satisfied and Ms. Faustin appears to be doing well. Ms. Faustin resides with her mother. She is working full time as a home health aide.

The bail modification sought herein would have Ms. Faustin discontinue home confinement but, instead, would substitute a curfew allowing Ms. Faustin to leave her residence each day for work and return to her residence from work each day at times directed by Pretrial Services. The reason for this modification is to facilitate Ms. Faustin's work schedule which can vary daily depending on the care needs of her clients. She would, however, continue on electronic monitoring.

Hon. Andrew L. Carter, Jr.

-2-

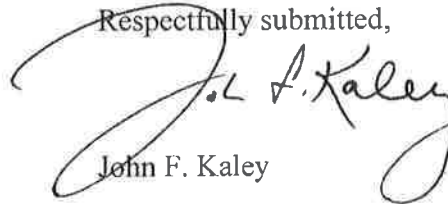
July 8, 2019

I have been in contact with Pretrial Services Officers Amanda Sanchez (EDNY) and John Moscato (SDNY)¹ who advise that Pretrial Services consents to the requested bail modification. I have been in contact with AUSA Daniel Wolf who advises that the Government does not object to the requested bail modification.

Accordingly, for the reasons set forth herein, I respectfully request that Ms. Faustin's bail conditions be modified to permit a curfew as directed by Pretrial in lieu of home confinement which would allow her to leave her residence daily for work and return to her residence at times directed by Pretrial Services while remaining on electronic monitoring.

Thank you for your consideration of this request.

Respectfully submitted,



John F. Kaley

cc: AUSA Daniel Wolf
Pretrial Services Officers Amanda Sanchez and John Moscato
(all via ECF filing and email)

GRANTED. The terms of pretrial release for Ms. Faustin shall be amended to remove home confinement and add a curfew as directed by the Pretrial Services Department. The Clerk of Court is requested to terminate the motion at Dkt. Nos.119 and 120.

7/9/2019

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

¹ Because Ms. Faustin resides on Long Island, she reports to Pretrial Services in the EDNY